



**JOINT DECLARATION OF  
SHERRY LICHTENBERG AND  
JOHN SIVORI**

**ATTACHMENT 1**

## BAN Trouble Tickets

Trouble Ticket #	Classification	Open Date	Close Date	Flash / Outage	Description/Impact	Special Notes
752123		9/1/99	OPEN	None to Date	Outage during testing that impacted production	
754780	Non Uniform Response Times	9/3/99	OPEN	None to Date	Timeout conditions	
754776	No Response	9/3/99	OPEN	None to Date	Non Response Transaction	
762691	No Response	9/14/99	OPEN	None to Date	Non Response Transaction	
762755	No Response	9/15/99	10/1/99	None to Date	No response from BAN concerning several transactions sent by MCI.	BAN checked and did not find a record of these transactions. They asked us to re-send.
770826	No Response	9/24/99	OPEN	None to Date	No response from BA (Production) until trouble ticket was opened. Still need to understand what the problem entailed.	
772205	No Response	9/27/99	9/28/99	None to Date	Did not receive response for INQNUMs ( 00013598BANSXEPX through 00013642BANSXEPX) after 4:20 PM. SSL3 handshake is failing probably because the BA server is not responding.	This was a MCI WorldCom internal connection problem that has been corrected.
772487	No Response	9/28/99	OPEN	None to Date	<p><b>TCPIP Failure</b></p> <p>Here are the INQNUMs after 4:20 PM today for which we did not receive any response.</p> <p>00013598BANSXEPX through 00013642BANSXEPX</p> <p>Actually, a detailed look at our log files showed that our SSL3 handshake is failing because (probably) the BA server is nor responding. So you might not have received these INQNUMs today.</p>	
775755	Non Uniform Response Times	10/1/99	10/1/99	None to Date	Type 1 Sev 1 - CR # 775755 - CLEC receiving slow responses processing CSRs via EDI	This was a MCI WorldCom internal connection problem that has been corrected.

<b>Trouble Ticket #</b>		<b>Open Date</b>	<b>Close Date</b>	<b>Flash / Outage</b>	<b>Description/Impact</b>	<b>Special Notes</b>
777551	No Response	10/4/99	10/4/99	Yes, after ticket was opened	All the orders we are trying to send (including the queued up ones) are not getting responses from BAN. After investigation, it was found that the outbound inquiries did not make it to BAN since our handshake failed. The last good transaction was at 12:41PM.	BAN Closed this trouble ticket, but did not explain why we were unable to connect with their server/IP address. They only stated that BAN would conduct an investigation - internally.
779977	Non Uniform Response Times	10/6/99	10/6/99	None to Date	The average retrieval time for CSRs was 23 minutes. This problem started at 11:26AM and went until 2:08PM.	BAN told us that the FTP queue was backed up.
780431	No Response	10/7/99	10/7/99	After we opened a TT.	Bell Atlantic is currently rejecting all CSR inquiry transactions sent via EDI. A severity 1 ticket has been opened with BA to get this resolved.	Problem cleared on its own, root cause still under investigation. Closed by BAN without explanation.
780750	No Response	10/7/99	10/7/99	None to Date	Bell Atlantic is currently rejecting all CSR inquiry transactions sent via EDI. A severity 1 ticket has been opened with BA to get this resolved.	BAN said that the FTP Daemons were hung and they reset them at 10:35 AM. I was also told that they are implementing a process to better track the response time to MCIWorldCom.
784815	Non Uniform Response Times	10/12/99	OPEN	None to Date	Response time spikes on the hour from 10AM to 2PM on Oct. 2nd.	
785725	No Response	10/13/99	OPEN	None to Date	TT Opened concerning 17 no responses from BAN at 12:40PM	They are investigating.
785972	No Response	10/13/99	OPEN	After a TT was opened.	1500+ no responses from BAN, starting at 1:56PM - total failure to CSR requests from BAN. Opened TT at 2:45PM.	This turned out to be a problem in the network between MCIWorldCom and BAN. A DS3 line was down at a data center.

787039	No Response	10/14/99	10/14/99	None to Date	Handshake failure once Network problem was resolved and our systems were brought back up. Lee Anderson called Richard Bowers at BAN to notify them of this issue at 2:50PM. Dan Kalhoon at BAN called back (at 2:54PM) to tell us that they had to reset the interactive agent to re-establish a successful handshake with MCIWorldCom.	This has been resolved.
		<b>BAN QA Environment Trouble Tickets</b>				
783770	No Response	10/11/99	OPEN	None to Date	This trouble ticket was opened because we were not receiving any responses from BAN on 14 inquiry numbers.	BAN is working on this and will implement a fix on the evening of Oct. 12th.



**JOINT DECLARATION OF  
SHERRY LICHTENBERG AND  
JOHN SIVORI**

**ATTACHMENT 2**

Monday, June 28, 1999

Bell Atlantic Change Control:

As discussed on the CLEC/Bell Atlantic conference call on Friday, June 25, 1999, I am providing MCIWORLD.COM's written response to the proposed implementation of Bell Atlantic's V2.4 Pre-ordering using Live Wire.

MCIWORLD.COM is requesting that Bell Atlantic temporarily postpone the planned implementation of V2.4 scheduled for August 1999. There are several reasons for this request. First, the current pre-order business rules have yet to be stabilized. Bell Atlantic has delivered a continuous string of pre-order releases, generally to correct errors made in previous releases. Since January, MCIWORLD.COM has reviewed and tested V2.1 and V2.2 for pre-ordering. Currently, MCIWORLD.COM is testing V2.3. MCIWORLD.COM is working through open issues in version 2.3 and hopes to build an interface based on this version. Version 2.4 based on Live Wire continues the instability of the pre-order interface and will require yet additional cycles of review, analysis, testing, and re-testing. Live Wire is a major system release that must be thoroughly reviewed and tested by CLECs. Bell Atlantic has scheduled just one week for CLECs to test this new release, which is impossible given the quality of Bell Atlantic's pre-order documentation. Thus, the release of Live Wire at this time will only serve to delay further MCI WorldCom's implementation of a working EDI-based interface for pre-ordering.

Second, the quantity of new elements introduced, modified functionality, and extensive business rules changes make the implementation of V2.4 a completely new version of pre-order. Address Validation & Direct TN Selection Inquiry includes 19 major field changes, 7 new fields, and 4 deleted fields from V2.3 business rule documentation. Address Validation & Direct TN Selection Response includes 6 major field changes, 18 new fields, and 1 deleted field from V2.3 business rule documentation. In addition, the Live Wire conversational mode introduces several new transactions, including TN Selection Inquiry, TN Selection, TN Reservation Inquiry, TN Reservation Response, Reservation Maintenance Inquiry, Reservation Maintenance Response, Reservation Maintenance Modification Inquiry, and Reservation Maintenance Modification, which involve completely new business rules, processes, and data elements. Significant new development is required to support this new functionality.

Third, Live Wire is an untested pre-order release for Bell Atlantic North. If past pre-order releases are used as a baseline to predict future testing success, any new defects identified could push pre-order development out into the 4<sup>th</sup> quarter 1999, at which time the Year 2000 system freezes will be in place.

Fourth, the borough-by-borough, state-by-state implementation of Live Wire may be a problem. The interface should be released after Bell Atlantic has completed and successfully tested the roll-out region-wide.

Fifth, no CLEC has identified that it requested an August implementation of V2.4, and the CLECs were not involved in the prioritizing or scheduling of the release. In any event, given



the significance of the changes required, it is doubtful that any CLEC will be able to implement the conversational mode by August.

There are additional concerns and requests that should be noted with the current V2.4 implementation that should be addressed. First, as proposed, the conversational Live Wire will actually make it more difficult, not easier, for CLECs to complete certain transactions. The Telephone Number ("TN") process, for example, will add significant transaction, processing, and interface requirements. The current process for a Telephone Number pre-assignment is a one-step process. The proposed Live Wire conversational mode requires at least 3 dependent steps: (1) Address Validation, (2) TN Selection, and (3) TN Reservation, and does not include the ability to exchange telephone numbers.

Second, MCI WorldCom was surprised to learn that BA-NY does not intend to return parsed service addresses in the Address Validation response in the direct mode. This is an important capability that should be added to the direct mode.

Based on the foregoing, MCI WorldCom recommends that V2.4 be postponed until February 2000, when its release may be coordinated with the release of LSOG 4. If Bell Atlantic declines to implement this recommendation, at the very least, Bell Atlantic must keep the V2.3 interface up and allow MCIWORLD.COM to complete testing and move pre-order into production. MCIWORLD.COM believes that V2.4 is a new interface and qualifies to be supported as a multiple version, per Change Management.

MCIWORLD.COM asks Bell Atlantic to respond to the following questions by Wednesday, June 30, 1999: Will BA-NY reschedule the Live Wire implementation? If so, what is the new schedule? If not, will V2.3 remain in production if V2.4 is implemented?

Sincerely,

Mark Turner  
MCIWORLD.COM



**JOINT DECLARATION OF  
SHERRY LICHTENBERG AND  
JOHN SIVORI**

**ATTACHMENT 3**

**\*\*\*REDACTED VERSION\*\*\***

**STATE OF NEW YORK  
PUBLIC SERVICE COMMISSION**

**Petition of New York Telephone Company            )  
for Approval of Its Statement of Generally        )  
Available Terms and Conditions Pursuant to        )  
Section 252 of the Telecommunications Act of        )        Case 97-C-0271  
1196 and Draft Filing of Petition for InterLATA )  
Entry Pursuant to Section 271 of the                )  
Telecommunications Act of 1996                    )**

**JOINT SUPPLEMENTAL AFFIDAVIT OF  
DARRELL FUQUAY AND JOHN SIVORI  
on Behalf of MCI WorldCom, Inc.**

Darrell Fuquay and John Sivori, being sworn upon oath, do hereby depose and state as follows:

1.       My name is Darrell Fuquay. I am the Manager of MCI WorldCom's Incumbent Local Exchange Carrier ("ILEC") Interface Application Development and Support. My team focuses on developing, implementing, and supporting the software for the pre-ordering and order interfaces for local service and Local Service Requests ("LSRs").

2.       My name is John Sivori. I am Senior Manager in MCI WorldCom's Information Technology Organization. My duties include the planning and implementation of electronic interfaces for pre-ordering and ordering operations in support of MCI WorldCom's entry into local telecommunications markets in the region served by Bell Atlantic. I testified on behalf of MCI WorldCom, Inc. at the OSS Technical Conference held in Albany, New York, on

**\*\*\*REDACTED VERSION\*\*\***

June 7 - 10, 1999, as well as the OSS Technical Conference held in New York, New York, on July 26 - 28, 1999.

3. The purpose of this affidavit is to respond to Bell Atlantic-New York's ("BA-NY") recent claims regarding its failure to provide flow-through processing for UNE-P orders as well as its failure to provide timely status notices as required under the Carrier-to-Carrier Guidelines and as promised in its April 1998 Pre-Filing Statement. BA-NY does not deny the fact of these deficiencies in performance, but BA-NY has improperly and without support in the record attempted to lay the blame on the CLECs, and MCI WorldCom in particular. While BA-NY has been unwilling or unable to produce sufficient, specific evidence to support its claims and to justify its poor flow-through rate, MCI WorldCom remains committed to getting to the bottom of these basic deficiencies. We commend Commission Staff for its efforts to date, and want very much to continue working with BA-NY and Staff to determine why so many orders are dropping to manual processing and to remedy the problem.

**A. BA-NY is Failing to Support Adequate Flow-Through Ordering Processing.**

4. Flow-through ordering is one of the most fundamental business requirements. It demands that a BOC demonstrate the capacity to receive and process commercial volumes of orders electronically, without the need for manual intervention. The FCC has found "a direct correlation between the evidence of order flow-through and the BOC's ability to provide competing carriers with nondiscriminatory access to the BOC's OSS

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functions.”<sup>1/</sup> This is so because its absence directly impedes the timely and efficient processing of both orders and key status notices, like firm order confirmations (“FOCs”) and rejection notices.<sup>2/</sup> There is no debating that, in order to compete effectively in the local markets, MCI WorldCom must have the same flow-through rates that BA-NY enjoys. What’s more, MCI WorldCom cannot move to commercial volumes of orders until it is assured that BA-NY can provide such flow-through rates.

5. BOCs tend to have very high flow-through rates at retail. Generally, one would expect to find flow-through in excess of 95% for residential orders and more than 80% for business orders. Unfortunately, BA-NY is far from meeting this goal for its wholesale clients. The flow-through rates for MCI WorldCom for electronic residential orders in May, June, and July were 48.6%, 54.5%, and 57.7%, respectively.<sup>3/</sup> Moreover, the vast majority of MCI

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<sup>1/</sup> *Application of BellSouth Corporation, BellSouth Telecommunications, Inc., and BellSouth Long Distance, Inc., for Provision of In-Region, InterLATA Services in Louisiana*, Memorandum Opinion and Order, 13 FCC Rcd 20599, ¶ 107 (1998) (“Second BellSouth Louisiana Order”).

<sup>2/</sup> *Second BellSouth Louisiana Order* ¶ 107; *Application of BellSouth Corporation, et al. Pursuant to Section 271 of the Communications Act of 1934, as amended, To Provide In-Region, InterLATA Services in South Carolina*, Memorandum Opinion and Order, 13 FCC Rcd 539, ¶ 105 (1997) (“BellSouth South Carolina Order”) (stating that BOCs must process CLEC orders with an “equivalent level of mechanized processing” as at retail); *Application of Ameritech Michigan Pursuant to Section 271 of the Communications Act of 1934, as amended, To Provide In-Region, InterLATA Services in Michigan*, Memorandum Opinion and Order, 12 FCC Rcd 20543, ¶ 196 (1997) (“Ameritech Michigan Order”) (“[I]t is virtually impossible for orders that are processed manually to be completed in the same time as orders that flow through electronically.”).

<sup>3/</sup> Although BA-NY does not report flow-through rates on a CLEC-specific basis, MCI WorldCom calculated BA-NY’s order flow-through rate for MCI WorldCom using BA-NY’s

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WorldCom's orders during these months were simple, residential orders, not the sort of complex orders that one might expect to require some manual processing. MCI WorldCom cannot ramp up to full commercial volumes if half of its simple POTS orders require manual processing.

6. BA-NY's failure to provide proper flow-through for ordering is already having real-world consequences: BA-NY is consistently failing to meet the required intervals for processing manual FOCs and rejection notices. This is hardly surprising. The unacceptably high volume of orders falling to manual is putting too much stress on BA-NY's manual processes. Under the Carrier-to-Carrier Guidelines, BA-NY must return 95% of its manual FOCs within 24 hours. For May, June, and July, BA-NY only met the interval for **\*\*\*REDACTED\*\*\*** for MCI WorldCom orders, respectively. A similar standard exists for rejection notices, but for these same months, BA-NY's percentages for MCI WorldCom orders were **\*\*\*REDACTED\*\*\***. These rates are plainly unacceptable.

**B. The Alleged Volatile Ordering Patterns Should Not Affect BA-NY's Flow-Through Rates.**

7. BA-NY does not deny that it has failed to provide adequate flow-through or that it has failed to meet the required intervals for these key status notices. Instead, BA-NY has recently begun claiming that its failures should be excused because the problem lies not with BA-NY's systems and processes but with CLEC volatile ordering patterns. Specifically, BA-NY has said that the CLECs are creating "spikes" in ordering volumes by "batching" their orders and

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reported carrier-to-carrier data for MCI WorldCom.

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that as result BA-NY cannot be expected to provide flow-through order processing at parity or to send timely FOCs and reject notices.<sup>4/</sup> *See* Brief of BA-NY, filed Aug. 17, 1999, at 34-35; *see also* Joint August Reply Affidavit of Julie A. Canny, George Dowell, Marion C. Jordan, and R. Michael Toothman on Behalf of Bell Atlantic-New York, dated August 30, 1999, at ¶ 21 (stating, for example, that absent notice of expected volumes, “MCI has no reasonable expectation of immediate FOC turnaround”).

8. As a threshold matter, MCI WorldCom contests BA-NY’s basic premise that “spikes” in order volumes should cause orders to drop to manual processing. So long as the orders that are being sent for processing are designed to flow-through BA-NY’s systems, even extreme fluctuations in ordering patterns should not affect flow-through rates in the least. Only if the volumes significantly exceeded the capacity of BA-NY’s systems, which is most certainly not the case here, could volatility in ordering patterns affect flow-through. The FCC has held as much. In its Ameritech Michigan Order, the FCC expressly rejected the argument that a BOC was entitled to notice from the CLECs of “spikes” in ordering volumes and held that a BOC

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<sup>4/</sup> MCI WorldCom has also learned that BA-NY has gone so far as to suggest to the Commission in informal discussions that MCI WorldCom has purposely manipulated its orders to cause BA-NY to drop them to manual and to lose flow-through capability. This aspect of BA-NY’s recent advocacy is outrageous, reckless, and completely unsupported by the record. Tampering with evidence is a serious charge, and a party leveling such a charge bears a heavy burden of proof. BA-NY should be made to either produce such evidence or retract its unfounded and unwarranted accusations against MCI WorldCom.



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“should be able to handle, without receiving advance notice from competing carriers, volumes of orders that fall within its stated capacity.”<sup>5/</sup>

9. In this case, BA-NY certainly cannot complain that MCI WorldCom or the CLECs in the aggregate are asking BA-NY to process more than its reasonable commercial capacity. In most cases, the ordering “spikes” that so concern BA-NY are around 2,000 to 3,000 orders, and in only one case does the volume reach 4,000. Brief of BA-NY, Att. A. These are well within reasonable ordering volumes. In order to even begin to compete with BA-NY in the local markets, MCI WorldCom alone will have to be able to send a minimum of 5,000 to 6,000 orders per day. Even KPMG’s stress test for ordering involved more than 7,000 orders. KPMG’s Final Report, at POP 6 IV-147 (Aug. 6, 1999).

10. Therefore, BA-NY’s initial premise that fluctuations in ordering volumes may excuse its failure to provide flow-through order processing is fundamentally unsound and must be rejected. Moreover, once this premise has been debunked, BA-NY’s further claim that the “spikes” in orders should excuse its inability to provide timely FOCs and reject notices can be seen for what it actually is, namely the claim that having failed to achieve the requisite flow-through capability for ordering, BA-NY is finding it difficult to manually process commercial volumes of FOCs and reject notices. Obviously, this is not an excuse, but is simply an admission of failure to meet its basic 271 obligations.

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<sup>5/</sup> Ameritech Michigan Order ¶¶ 195, 198.

**\*\*\*REDACTED VERSION\*\*\***

11. Though not relevant in light of the foregoing, MCI WorldCom feels compelled to respond to BA-NY's further claim that what volatility does exist in ordering patterns today is the result of MCI WorldCom purposely "batching" its orders. In its most recent affidavit, BA-NY says that "it is obvious that [MCI WorldCom] is holding orders to batch them and that its bulk ordering is not live on-line with the customers." BA-NY Aff. ¶ 22. These claims are false and completely unsupported by the record.

12. MCI WorldCom does not hold orders in order to batch them and its normal ordering processes occur with the customers on the line. Today, most of MCI WorldCom's orders are placed either through its outbound sales centers or inbound customer service centers, where MCI WorldCom representatives take customer orders and enter them into MCI WorldCom's systems for transmission to BA-NY while the customers are on the line. In a small percentage of cases (**\*\*\*REDACTED\*\*\***), the representative is unable to obtain the necessary third-party verification ("TPV") for the order during the customer's initial call. Those orders must be held pending verification and are sent later. But the vast majority of these orders (**\*\*\*REDACTED\*\*\***) are taken and entered live with the customer.

13. This said, it is still the case that MCI WorldCom places orders with BA-NY 24 hours per day/7 days per week and that order volumes fluctuate. This is so because MCI WorldCom must also process orders that fail its internal auditing mechanisms, orders that are rejected by BA-NY, and orders that must be held due to BA-NY system outages or MCI WorldCom new software releases, and MCI WorldCom processes these orders on a 24 hour per day/7 day per week basis. Sometimes MCI WorldCom corrects errors that have resulted in

rejects and resubmits the orders at one time. Other times, technical problems or the release of new software may cause MCI WorldCom or BA-NY to hold orders and submit them as a group at a later time. There is nothing extraordinary in this. It is simply the way systems work in the real world, and BA-NY must be able to process these order flows without manual intervention.

**C. BA-NY Has Failed to Support its Additional Claims that its Poor Flow-Through Rates are Due to Legitimate System Design Decisions and CLEC Errors.**

14. In addition to its false claims that MCI WorldCom is batching orders, BA-NY has suggested at least two other excuses for why it is processing such a high percentage of CLEC orders manually. BA-NY has said that its poor performance is more likely due to CLEC errors in preparing the orders or because its system design properly requires manual processing. See BA-NY Aff. ¶ 26.

15. BA-NY's defense of its flow-through rates is not novel. In both its South Carolina application and its second Louisiana application, for instance, BellSouth blamed its poor flow-through rates on CLEC errors. In response, the FCC has held that the BOC bears the burden of substantiating such claims. And, in both cases, the FCC rejected BellSouth's claims for want of evidence and warned the BOCs that they would have to provide supporting data and documentation to substantiate such claims in the future.<sup>6/</sup> As in those cases, BA-NY has to provide sufficient, specific evidence to support its claims.

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<sup>6/</sup> See BellSouth South Carolina Order ¶ 108; Second BellSouth Louisiana Order ¶ 111.

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16. To date, there have been two analyses done to determine the percentage of orders dropped to manual that are attributable to (1) BA-NY system problems; (2) BA-NY system design; and (3) CLEC errors. In the first analysis, BA-NY analyzed a sampling of 486 CLEC orders from August 23-26, 1999, on a order-for-order basis. According to BA-NY, only 127 of the 486 orders (27%) had to be processed manually due to CLEC errors in preparing the orders.

Listed address req manual work	73
IDV; CBR FID has invalid DA (local contact tel # formatted incorrectly)	35
Form: EU Tag: DN (New BTN info invalid on a new line)	19

17. Moreover, a closer examination of the “CLEC error” category shows the significant role that BA-NY plays in these errors as well. The 73 errors relating to the listed address are typographical errors in the orders, which are directly attributable to the fact that MCI WorldCom and the other CLECs are still limited to using BA-NY’s Graphical User Interface (“GUI”) for pre-ordering and must manually rekey the customer’s pre-ordering information when creating an order. Thus, BA-NY may address this aspect of the flow-through problem by living up to its obligation to provide a working EDI interface for pre-ordering.

18. The last two errors, accounting for 54 of the total orders that fell to manual processing, are alleged failures to follow BA-NY’s business rules. Given BA-NY’s history of problems with its business rule documentation, these errors are as likely to be caused by BA-NY’s poor documentation and training as they are to be the fault of MCI WorldCom. For

**\*\*\*REDACTED VERSION\*\*\***

instance, MCI WorldCom's review of BA-NY's business rules revealed no rule that CLECs are supposed to provide a different local contact number from the customer's current number on UNE-P orders (which is the error indicated by the "IDV; CBR FID has invalid DA (local contact tel # formatted incorrectly)" error code). Until BA-NY can confirm the adequacy of its documentation for these errors, the question remains open whether that fault lies with BA-NY or with MCI WorldCom.

19. The second analysis of BA-NY's flow-through performance was conducted by Commission Staff.<sup>7/</sup> Staff looked at approximately 3850 error messages from July and August, and found that 13 error messages accounted for 88% of the orders that fell to manual processing in the sample. The Staff's findings were as follows:

BA-NY Systems Problems	22%
Lack of Flow-Through by Design	46%
CLEC Error	32%

Within the category of "CLEC Error," 63% were the result of typographical and other simple entry errors that should be addressed by integrating the pre-ordering and ordering functions with an EDI interface for pre-ordering. The other 37% were errors related to BA-NY business rules, which MCI WorldCom believes may be most effectively addressed by BA-NY publishing a clear, accurate, and stable set of business rules, along with the proper education for MCI WorldCom personnel.

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<sup>7/</sup> Email from W. Brindley (Commission Staff) to MCI WorldCom and BA-NY, dated Sept. 16, 1999.

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20. Thus, the two analyses that categorize the orders falling to manual in terms of BA-NY systems, design, and CLEC error show that MCI WorldCom is responsible for, at most, approximately 30% of the dropped orders. The other 70% fall plainly within BA-NY's control. What's more, of the 30% attributable to "CLEC Error," a substantial percentage are directly due to BA-NY's failure to implement EDI for pre-ordering and another significant portion are likely attributable to BA-NY's failure to provide adequate business rule documentation and CLEC training.

21. In addition to these analyses, BA-NY produced a listing of the error codes associated with MCI WorldCom orders from July 11-17 and August 22-September 5.<sup>8/</sup> This data is problematic for several reasons, however. First, the error categories are too high level to permit meaningful analysis. As BA-NY explained on a conference call with MCI WorldCom and Commission Staff on September 14, 1999, this data was not meant to show the root causes for orders dropping to manual processing or whether the orders are falling to manual as the result of BA-NY systems or MCI WorldCom errors. Telling us, for instance, that a particular order dropped to manual due to a DOEE113 error for directory listing changes does not tell us whether the order fell to manual because an MCI WorldCom representative made an error in retyping the listing on the order or whether BA-NY's systems are designed to drop all directory listing changes to manual. We must have this order-specific information to get to the bottom of the flow-through problems.

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<sup>8/</sup> Email from W. Smith (BA-NY) to K. Scardino (MCI WorldCom) and W. Brindley (Commission Staff), dated Sept. 14, 1999 (proprietary).

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22. Second, we are concerned that BA-NY asks us simply to ignore two of the largest categories of error messages in its data set: the “IFAS200 Host Interface Error - Refer to System Administrator,” which accounts for 1177 of the error messages in the July sample and 2097 in the August sample, and the “LV5I001-The number of Nonretail orders is 1,” which accounts for 1024 error messages in July and 3471 in August. The problem is that BA-NY does not indicate which of the orders (or Purchase Order Numbers (“PONs”)) associated with these error messages fell to manual processing and which flowed through. The omission of the IFAS200 PONs is particularly troubling because MCI WorldCom has been receiving the IFAS200 error message for orders placed at night for the past three weeks. In order to assess the magnitude and impact of these error codes, it is essential that we know if they are applicable to orders that fell to manual processing. Without the PONs, it is not possible to determine whether these errors really can be ignored, as BA-NY insists.

23. As the foregoing shows, BA-NY has clearly not carried its burden to provide reliable data and documentation to substantiate its excuses and allegations regarding the lack of flow-through. What the evidence shows is the fact that BA-NY has only managed to process approximately half of MCI WorldCom’s UNE-P orders on a flow-through basis. The data produced to date further indicates that the bulk of the orders dropping to manual--some 70%--are the direct result of BA-NY system problems and design, and that even the 30% attributable to “CLEC error” are closely related to the continuing difficulties with BA-NY’s EDI for pre-ordering and its business rules documentation. Finally, the evidence shows that BA-NY

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has consistently failed to meet the established intervals for FOCs and reject notices for manually processed orders.

24. These are serious deficiencies, and until they are remedied, MCI WorldCom will remain at a significant competitive disadvantage to BA-NY in the local markets. MCI WorldCom is, therefore, committed to learning the root causes of these problems and to remedying them. What is called for is a comprehensive analysis of BA-NY's carrier-to-carrier data for July and August as soon as it becomes available. Analyzing BA-NY's most recent data is particularly important because we understand that BA-NY implemented systems enhancements in August that may affect its flow-through capabilities. We must determine which orders are falling to manual processing and why this is occurring. We believe that it is imperative for the parties and Staff to continue working together to this end.



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**CONCLUSION**

This concludes our Joint Supplemental Affidavit on Behalf of MCI WorldCom.

On this \_\_\_\_\_ day of September 1999, I hereby swear under penalty of perjury  
that the foregoing is true and correct to the best of my knowledge and belief.

\_\_\_\_\_  
Darrell Fuquay

\_\_\_\_\_  
Notary Public

\_\_\_\_\_  
John Sivori

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Notary Public